



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*86 Chambers Street  
New York, New York 10007*

April 9, 2021

**BY ECF**

The Honorable Andrew L. Carter, Jr.  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 2203  
New York, NY 10007

Re: *Knight First Amendment Institute v. U.S. Dep't of Homeland Security et al.*,  
No. 17 Civ. 7572 (ALC)

Dear Judge Carter:

I write respectfully on behalf of both parties in the above-referenced FOIA action, regarding the joint status update that the parties proposed to submit today, April 9, 2021, *see* Dkt. No. 172, and which the Court so-ordered, *see* Dkt. No. 163, to respectfully request until April 14, 2021, to submit such a joint status update.

As the Court is aware, various defendant agencies and components agreed to conduct a search for documents responsive to Item Number 1 in plaintiff's FOIA Request, and the United States Department of State, Customs and Border Protection, Department of Justice, Homeland Security, and Citizenship and Immigration Services have completed searching, processing and producing responsive documents, if any. *See* Dkt. No. 171. As the parties previously detailed, Immigration and Customs Enforcement ("ICE") and plaintiff agreed on specific search terms; ICE completed those searches and informed the Knight Institute of the initial results, indicating that the search had returned at least 263,857 potentially responsive documents (not pages) after de-duplication; and thereafter, the parties have been revising the search parameters to try to narrow the universe of potentially responsive records. *See id.*; *see also* Dkt. No. 172. In light of the complexity involved in these discussions, the parties jointly and respectfully request until April 14, 2021, to review, comment on, and finalize and submit the joint status report.

I thank the Court for considering this matter.

Respectfully,

AUDREY STRAUSS  
United States Attorney

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cc: Counsel for Plaintiff (by ECF)